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and on behalf of all other persons similarly situated*

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

JANE DOE 1, individually and on
behalf of all other persons similarly
situated,

Plaintiff,

vs.

BANC, JACK & JOE, LLC dba
TITILATIONS GO-GO-BAR, BANC
PERO, JOSPEH CARERI, JACK
PERO, ABC COMPANIES 1-10 and
JOHN DOES 1-10,

Defendants.

Civil Action No.: 2:17-cv-03843-KSH-CLW

**DECLARATION OF PLAINTIFF JANE
DOE 1 IN SUPPORT OF PLAINTIFF'S
MOTION FOR CONDITIONAL
COLLECTIVE CERTIFICATION AND
JUDICIAL NOTICE AND FOR CLASS
CERTIFICATION**

I, **Jane Doe 1**, of full age and upon her oath, declare as follows:

A. Introduction

1. I am the Plaintiff in the above captioned matter and the foregoing is based upon personal knowledge. I make this Declaration in support of Plaintiff's motion for conditional certification pursuant to 29 U.S.C. § 216(b).

2. In the Court's decision on my initial motion for conditional certification, the Court noted my failure to submit declarations from other dancers and my failure to name other dancers who might have been affected by Titillations' unlawful policies.

3. Then, at my deposition and in opposition to my motion for reconsideration of the original conditional certification decision, Counsel for Defendants attempted to exploit the fact that no other dancers opted into this action.

4. There is a good reason for that—one out of my control. As I explained in my deposition, dancers all use stage names, and we did not interact or socialize outside of work. In fact, I only knew the real name of one other person with whom I worked at Titillations. Therefore, it would be impossible for me to give the names or specifics for other dancers or for me to obtain declarations from them.

5. Additionally, most of the dancers wear wigs and heavy make-up, so while I was able to think of several dancer's stage names and have vague recollections of what they look like, it is not possible for me to contact them or even notify them that this case is ongoing, despite the fact that I am trying to vindicate all of our rights.

6. At my deposition, Counsel for Defendants also attempted to exploit the fact that I did not complain about not being paid the minimum wage while employed at Titillations.

7. The fact is that I have only a high school education, and I am not aware of the intricacies of wage and hour law; I depend on my counsel to assert my rights and those of all the other dancers who were not properly paid.. The reason that I sought out counsel in the first place was that I had read on line that many strip clubs do not pay their dancers minimum wage, and that many of those strip clubs were found to have violated the law. While I still do not have a thorough understanding of the law, I do realize now that I was misclassified as an independent contractor the whole time. This happened to all the dancers at Titillations also.

8. I have been and continue to rely on my competent counsel regarding the technical legal aspects of this case and to help get justice for the other dancers at Titillations who have been wronged.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on April 26, 2019

